Fitzgerald & Associates, P.C.

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY -- NEWARK

Chapter 13

In re:

Shirley Davis,

Case No. 20-23744-RG Hearing Date: 7/20/22 Time: 10:00 a.m.

Debtor

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## ATTORNEY'S SUPPLEMENTAL CERTIFICATION IN OPPOSITION TO STAY RELIEF MOTION AS TO VEHICLE

- I, Nicholas Fitzgerald, the above named debtor's counsel, hereby certifies as follows:
- 1. I make this supplemental certification in opposition to the debtor's vehicle lender's stay relief motion which is now returnable on July 20, 2022.
- 2. I met with the debtor today and she informed me that she had personally been in contact with her vehicle lender and that the vehicle lender claims that it didn't get the December 2021 payment and the April 2022 payment.
- 3. The debtor pays her vehicle loan via money order. She has placed a trace on the money orders for the December 2021 payment and for the April 2022 payment. The debtor informed me that she will need at least 20 days from today's date to put a

trace on those money orders.

- 4. Accordingly, we will request an adjournment of the stay relief motion.
- 5. On July 11, 2022, I mailed a copy of the within certification to:

Stewart Legal Group, P.C.
Attn: Gavin N. Stewart, Esq.
Counsel for Toyota Motor Credit Group
401 East Jackson Street, Suite 2340
Tampa, FL 33602

6. My staff will request consent of the Stewart Legal Group, P.C. to adjourn the within motion to provide the debtor with time to obtain proof of payment by way of copies of money orders sent to the vehicle lender.

I certify that the foregoing statements made by me are true.

I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 11, 2022

Nicholas Fitzgerald Debtor's Counsel